

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
NORTHWESTERN DIVISION

United States of America,)	
)	
Plaintiff,)	
)	Case Number 1:17-cr-133
vs.)	
)	DEFENDANT'S AMENDED SECOND
Alicia Standish,)	MOTION FOR FURLOUGH
)	
Defendant.)	

Comes now, Alicia Standish, Defendant above-named, by and through her attorney, Ashley A. Flagstad, requests a furlough to travel so the Defendant can obtain an addiction evaluation and be admitted into residential treatment. On June 30, 2017, the Court issued an Order allowing the Defendant to be released on an overnight furlough to obtain a chemical dependency evaluation to take place at Heartview in Bismarck, North Dakota. Based upon circumstances outside of the Defendant's control, the pre-arranged ride to be provided by her Mother was unable to materialize based upon the July 4th holiday and the distance of travel.

The Defendant request the Court permit her to be released for a furlough so that she can travel for a face-to-face evaluation and be admitted into residential treatment at the New Freedom Center in Bismarck, North Dakota. Defendant currently is scheduled for an evaluation with New Freedom on Monday, July 17 at 1:30 PM. (See Exhibit 1). Assuming residential treatment is recommended, admission will be immediately following the evaluation. Defendant further moves the Court to permit her sister, Robin Standish, to transport Defendant from Heart of

America Correctional and Treatment Center in Rugby, North Dakota, to New Freedom Center in Bismarck, North Dakota on July 17, 2017. It is approximately a three hour drive between Rugby and Bismarck. As such, the Defendant requests she be released at 8:00 AM so she can travel to Bismarck, obtain the evaluation and be admitted to the facility. If not admitted into the facility, the Defendant will be immediately transported back to Heart of America Correctional and Treatment Center. The Defendant requests the furlough remain in place while attending residential inpatient. The Defendant reserves all rights to later file a motion to modify the detention order in any manner under 18 USC §3145 and to modify the order for release of Defendant pending trial. The US Attorney's office has indicated to the undersigned they are in agreement to the Defendant's request for a furlough to obtain an addiction evaluation.

Dated at Minot, North Dakota, this 13th day of July, 2017.

PRINGLE & HERIGSTAD, P.C.

By /s/ Ashley Flagstad
Ashley A. Flagstad (ID #07503)
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Attorney for Defendant

Certificate of Service

I hereby certify that on the 13th day of July, 2017, the following document:

Defendant's Amended Second Motion for Furlough

was filed electronically with the Clerk of Court through ECF, and that ECF will send a Notice of Electronic Filing (NEF) to the following:

Rick L. Volk

(rick.volk@usdoj.gov)

I further certify that copy of the foregoing documents will be mailed by first class mail, postage paid, to the following non-ECF participants:

N/A

Dated this 13th day of July, 2017.

/s/ Ashley Flagstad

Ashley A. Flagstad (ID #07503)

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Attorney for Defendant